



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 23 2015

REPLY TO THE ATTENTION OF:

Wade Van Zee
Regional Environmental Manager
Stericycle, Inc.
5815 Weldon Springs Road
Clinton, Illinois 61727

Dear Mr. Van Zee:

This letter is in response to the enclosed August 26, 2014, petition for other site-specific operating parameters to be used during startup and shutdown at the Stericycle, Inc. hospital medical and infectious waste incinerator (HMIWI) in Clinton, Illinois (the Facility) that is subject to 40 C.F.R. Part 60, Subpart Ce "Emission Guidelines and Compliance Times for Hospital/Medical/Infectious Waste Incinerators." Subpart Ce includes references to provisions in 40 C.F.R. Part 60, Subpart Ec. Stericycle asked EPA to do three things at this HMIWI: 1) waive the performance test for shutdown and startup scenarios, 2) grant approval to operate under combustion control only when waste is not being charged into the incinerator, and 3) establish site specific operating parameters for the combustion control only scenario. Each of these items will be addressed in turn.

Stericycle does not need to submit a request for waving the performance test for startup and shutdown scenarios because the Facility never needs to test the units under start-up, shutdown, and malfunction conditions per 40 C.F.R. § 60.8(c). Stericycle can operate under the combustion control only scenario during startup and shutdown when waste is not being charged into the incinerator as long as the Facility meets the required emissions limits in the regulations.

Stericycle proposed some operating parameters for the combustion control only scenario. Instead of the proposed parameters, EPA would like Stericycle to use a version of the required parameters in the regulations at 40 C.F.R. Part 62 Subpart HHH Federal Plan Requirements for Hospital/Medical/Infectious Waste Incinerators Constructed on or before December 1, 2008 Table 3. Table 3 lists Maximum Charge Rate and Minimum Secondary Chamber Temperature as the required parameters to be monitored under the combustion control only scenario. EPA understands and agrees that during startup and shutdown the Maximum Charge Rate will be zero and that is what should be recorded. Instead of recording the Minimum Secondary Chamber Temperature during startup and shutdown, EPA finds that Stericycle should record the chamber temperature once per minute during startup and shutdown to demonstrate that the temperature is increasing (startup condition) or decreasing (shutdown condition).

If you have any questions concerning the determination provided in this letter, please contact Ms. Jennifer Wilson of my staff at (312) 353-3115.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sara Breneman".

Sara Breneman

Chief

Air Enforcement and Compliance Assurance Branch

Enclosure

cc: Eric Jones

Illinois Environmental Protection Agency

Lindsey Kroos

ALL4 Inc.

CERTIFICATE OF MAILING

I, Kathy Jones, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Eric Jones
Manager Compliance Unit
Bureau of Air
Illinois Environmental Protection Agency
1201 Grand Avenue East
Springfield, Illinois 62702

Wade Van Zee
Regional Environmental Manager
Stericycle
5815 Weldon Springs Road
Clinton, IL 61727

On the 23 day of November 2015.



Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT for Mr. Jones:

7014 2870 0001 9581 3611

CERTIFIED MAIL RECEIPT for Mr. Van Zee:

7014 2870 0001 9581 3628

I also certify that I e-mailed a copy of this letter to Lindsey Kroos, a consultant at All4 Inc., at lkroos@all4inc.com.